

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Implementation of the Pay Telephone	)	CC Docket No. 96-128
Reclassification and Compensation	)	
Provisions of the Telecommunications	)	
Act of 1996	)	
	)	
Ameritech's Plan to Provide Comparably	)	DA 97-790
Efficient Interconnection to Providers of	)	
Pay Telephone Services	)	

AMERITECH'S REPLY TO COMMENTS  
ON APPLICATION FOR REVIEW

Ameritech<sup>1</sup> submits this reply to AT&T's comments on consolidated application for review filed by the American Public Communications Council ("APCC") with respect to the Commission's orders approving the payphone CEI plans of Ameritech and other BOCs.<sup>2</sup>

AT&T's comments deal solely with the issue of screening codes. However, as Ameritech showed in its comments, the Bureau was correct in dismissing

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<sup>1</sup> Ameritech means: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

<sup>2</sup> See, e.g., *In the Matter of Ameritech's Plan to Provide Comparably Efficient Interconnection to Providers of Pay Telephone Services*, CC Docket No. 96-128, Order DA 97-790 (released April 15, 1997) ("Order").

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APCC's claim that, as a CEI requirement, the BOCs must provide independent pay telephone service providers ("IPPs") using COCOT lines -- *i.e.*, "dumb" lines used with "smart" pay stations -- with screening code digits that uniquely identify their lines as payphone lines.

Ameritech showed that APCC was incorrect that alleging that the current "07" provided to IPPs using COCOT service is inferior for call counting and the collection of per-call payphone compensation which will begin later this year. As Ameritech noted, interexchange carriers ("IXCs") are provided with a list of all ANIs associated with payphone lines. Regardless of whether calls from COCOT lines have a unique screening code, all calls will have to be checked against this list in any event to identify the payphone service providers to whom compensation needs to be made. A unique code associated with the COCOT line would not, by itself, provide IXCs any information about whom should be compensated for a call from the line associated with the code. The same is true for "smart" coin lines. The "27" code transmitted in connection with those lines does not tell IXCs the identity of the payphone provider to whom compensation should be made.<sup>3</sup> Thus, a unique screening code for COCOT lines would be neither necessary nor, by itself, sufficient for compensation purposes.

In addition, the CEI requirement of nondiscrimination is met since any IPPs subscribing to a coin line would receive a "27" screening code. Also, in those

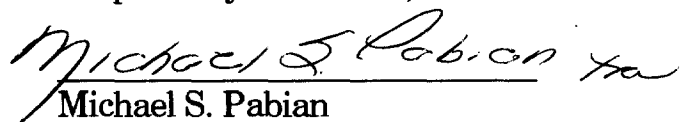
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<sup>3</sup> In Ameritech's case, IPPs do subscribe to coin line service.

situations in which Ameritech's payphone operations utilizes a COCOT line, it will receive a "07" code just as other purchasers of COCOTs lines would receive.

Finally, the Bureau correctly observed that the issue of whether Ameritech is providing proper screening information is one that is not technically within the scope of the CEI review process.<sup>4</sup> The matter is being separately addressed in the context of the Commission's payphone rulemaking proceeding.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Michael S. Pabian", is written over a horizontal line.

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Dated: July 14, 1997


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<sup>4</sup> Order at ¶60.

**CERTIFICATE OF SERVICE**

I, Edith Smith, do hereby certify that a copy of the foregoing Ameritech's Reply to Comments on Application for Review has been served on the parties listed below, via first class mail, postage prepaid, on this 14th day of July, 1997.

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